

UNITED STATES DISTRICT COURT  
 DISTRICT OF SOUTH CAROLINA  
 GREENVILLE DIVISION

JANE DOE 1, JANE DOE 2, JANE DOE 3, )  
 JANE DOE 4, JANE DOE 5, JANE DOE 6, ) Civil Action No. 6:22-CV-02957-HMH  
 JANE DOE 7, JOHN DOE 1, JOHN DOE )  
 2, AND JOHN AND JANE DOES 1-100, )

Plaintiffs, ) **AFFIDAVIT OF LAURI HARRIS**  
 )  
 vs. )  
 )  
 VARSITY BRANDS, LLC; VARSITY )  
 SPIRIT, LLC; VARSITY BRANDS )  
 HOLDING COMPANY, INC.; U.S. ALL )  
 STAR FEDERATION; USA )  
 FEDERATION OF SPORT CHEERING )  
 D/B/A USA CHEER; JEFF WEBB, )  
 CHARLESBANK CAPITAL PARTNERS, )  
 LP, BAIN CAPITAL, LP; ROCKSTAR )  
 CHEER & DANCE, INC., KATHERINE )  
 ANNE FOSTER AS THE PERSONAL )  
 REPRESENTATIVE OF THE ESTATE )  
 OF SCOTT FOSTER; KATHY FOSTER )  
 INDIVIDUALLY, KENNY FEELEY, )  
 JOSH GUYTON, NATHAN ALLAN )  
 PLANK, CHRISTOPHER HINTON, )  
 TRACY A/K/A OR F/K/A TRAEVON )  
 BLACK, PETER HOLLEY, AND OTHER )  
 UNKNOWN DEFENDANTS, )  
 )  
 Defendants. )

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Lauri Harris, being over the age of eighteen (18) years, having personal knowledge of the facts contained herein, being first duly sworn, upon their oath, deposes and states as follows:

1. I am the Executive Director for Defendant USA Federation of Sport Cheering d/b/a USA Cheer (“USA Cheer”).
2. I am familiar with the business records of USA Cheer, which were made in the ordinary course of business.

3. The Defendant USA Cheer is a non-profit corporation organized and existing under the laws of the State of Texas.

4. The Defendant USA Cheer does not have employees, contractors, or subsidiaries in South Carolina, does not have a bank account in South Carolina, does not own property in South Carolina, does not have a mailing address in South Carolina, does not maintain any businesses in South Carolina, and does not have an agent for service of process in South Carolina.

5. The Defendant USA Cheer does not own, operate, or control any training facilities or gyms in South Carolina.

6. The Defendant USA Cheer has not held any events, clinics, conferences, camps or competitions in South Carolina.

7. The Defendant USA Cheer does not organize, promote, or sponsor any camps anywhere in South Carolina.

8. No gyms located in South Carolina pay membership dues to Defendant USA Cheer.

9. The Defendant USA Cheer has no member clubs in South Carolina.

10. Any member clubs of USA Cheer are separate and distinct entities from USA Cheer.

11. The Defendant USA Cheer has not set up or maintained any member clubs or entities in South Carolina.

12. The Defendant USA Cheer does not mandate that non-member clubs, high schools, or colleges follow USA Cheer's rules or regulations.

13. No schools located in South Carolina are members of USA Cheer.

14. The Defendant USA Cheer does not mandate that any schools in South Carolina abide by any USA Cheer rules or regulatory framework.

15. The Defendant USA Cheer does not mandate that Defendant Rockstar Cheer & Dance, Inc. ("Rockstar") abide by any USA Cheer rules.

16. The Defendant Rockstar, the Defendant U.S. All Star Federation, Inc. ("USASF"), and the Defendants Varsity Brands, LLC, Varsity Spirit, LLC, and Varsity Brands Holding Company, Inc. (collectively "Varsity Defendants") were neither set up, organized, nor maintained by USA Cheer.

17. The Defendant USA Cheer does not operate the Defendant Rockstar, USASF, or the Varsity Defendants.

18. The Defendant USA Cheer has no control over Defendant Rockstar, USASF, the Varsity Defendants, or the individual Defendants in this action.

19. Neither the Defendant Rockstar, USASF, nor the Varsity Defendants have ever been a member of or affiliated with USA Cheer.

20. Based on USA Cheer's business records and the limited information available, no Plaintiffs in this action have ever been a member of USA Cheer.

21. The Defendant USA Cheer has never exercised any control that influenced any member of USA Cheer or any other person or entity to maintain contacts in South Carolina.

22. None of the individual Defendants in this action have ever been employed by or agents of USA Cheer.

\*\*SIGNATURE BLOCK IS ON THE NEXT PAGE\*\*

FURTHER, AFFIANT SAYETH NAUGHT

Lauri Harris

Lauri Harris, Executive Director

USA Federation of Sport Cheering d/b/a USA  
Cheer

SWORN TO AND SUBSCRIBED BEFORE ME

This 9 day of JANUARY, 2023.

PLG228 Soc Attached On JCAT  
Notary Public for California  
My Commission Expires: 07/19/2023

**CALIFORNIA JURAT WITH AFFIANT STATEMENT****GOVERNMENT CODE § 8202**

See Attached Document (Notary to cross out lines 1-6 below)

See Statement Below (Lines 1-6 to be completed only by document signer[s], not Notary)

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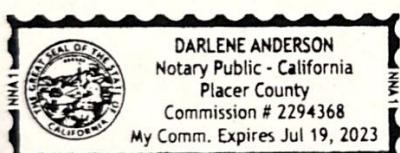
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Signature of Document Signer No. 1

Signature of Document Signer No. 2 (if any)

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of PLACER

Subscribed and sworn to (or affirmed) before me

on this 9<sup>th</sup> day of JANUARY, 2023,by Date Month Year(1) Lauri Harris

(and (2) \_\_\_\_\_),

Name(s) of Signer(s)

proved to me on the basis of satisfactory evidence  
to be the person(s) who appeared before me.

Signature

Signature of Notary Public

Seal

Place Notary Seal Above

**OPTIONAL**

Though this section is optional, completing this information can deter alteration of the document or  
fraudulent reattachment of this form to an unintended document.

**Description of Attached Document**Title or Type of Document: AFFIDAVIT OF Lauri Harris Document Date: 01/09/2023Number of Pages: 4 Signer(s) Other Than Named Above: \_\_\_\_\_